

**Federal Defenders  
OF NEW YORK, INC.**

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Tamara Giwa  
*Executive Director*

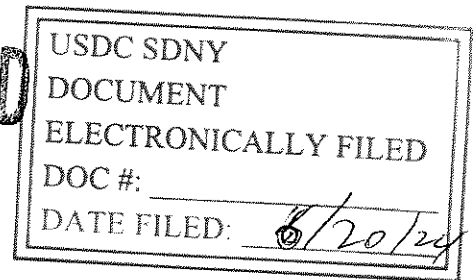
Jennifer L. Brown  
*Attorney-in-Charge*

June 20, 2024

*By ECF and e-mail*

Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**



Re: *United States v. Luis Paulino*, 23 Cr. 600 (LAK)

Dear Judge Kaplan:

I write on consent (Assistant U.S. Attorney Jeffrey Coyle and U.S. Pretrial Services Officer Leo Barrios) to make two requests:

*First*, I respectfully request that the Court include in the Judgement a recommendation to the Bureau of Prisons that Mr. Paulino participate in its Residential Drug Abuse Treatment Program (RDAP). The program is designed to assist defendants who have a history of substance use successfully reenter the community.

*Second*: I respectfully request that the Court modify Mr. Paulino's bail in two ways: (1) to permit Mr. Paulino to visit his mother in the Bronx with the pre-approval of Pretrial Services as to the date and time of any such visits; and (2) to permit Mr. Paulino to attend his grandson's "graduation" from first grade on June 24, 2024, which will be held at his grandson's elementary school in the Bronx.

Respectfully submitted,

/s/ \_\_\_\_\_

Martin S. Cohen  
Ass't Federal Defender  
Tel.: (212) 417-8737

Cc. Jeffrey Coyle, Esq., by ECF and e-mail  
Leo Barrios, U.S. Pretrial Services, by e-mail

**SO ORDERED**

*Granted*  
*Leo Barrios*  
\_\_\_\_\_  
**LEWIS A. KAPLAN, USDJ**

*6/20/24*